

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- x  
PETERSEN ENERGÍA INVERSORA, S.A.U.  
and PETERSEN ENERGÍA, S.A.U., : Case Nos.  
Plaintiffs, : 1:15-cv-02739-LAP  
1:16-cv-08569-LAP  
- against - :  
ARGENTINE REPUBLIC and YPF S.A., :  
Defendants. :  
----- x  
ETON PARK CAPITAL MANAGEMENT,  
L.P., ETON PARK MASTER FUND, LTD. and :  
ETON PARK FUND, L.P., :  
Plaintiffs, :  
- against - :  
ARGENTINE REPUBLIC and YPF S.A., :  
Defendants. :  
----- x

**NOTICE OF DEFENDANTS' JOINT MOTION TO DISMISS FOR *FORUM NON  
CONVENIENS***

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss for *Forum Non Conveniens*, executed on August 30, 2019; the Declaration of Michael A. Paskin in Support of Defendants' Motion to Dismiss for *Forum Non Conveniens*, executed on August 30, 2019, and the exhibits thereto; the Declaration of Bernardo Saravia Frías in Support of Defendants' Motion to Dismiss for *Forum Non Conveniens*, executed on August 29, 2019, and the exhibits thereto; the Declaration of María Alejandra Etchegorry in Support of Defendants' Motion to Dismiss for *Forum Non Conveniens*, executed on August 29, 2019; the Declaration of Rafael M. Manóvil in Support of Defendants' Motion

to Dismiss for *Forum Non Conveniens*, executed on August 29, 2019, and the exhibits thereto; the Declaration of Guillermo Cabanellas in Support of Defendants' Motion to Dismiss for *Forum Non Conveniens*, executed on August 30, 2019, and the exhibits thereto; and the Declaration of Alfonso Santiago in Support of Defendants' Motion to Dismiss for *Forum Non Conveniens*, executed on August 29, 2019, and the exhibits thereto, Defendants the Argentine Republic and YPF S.A. hereby move this Court, before the Honorable Loretta A. Preska, at the United States Courthouse, Courtroom 12A, 500 Pearl Street, New York, New York 10007, for an Order pursuant to the doctrine of *forum non conveniens* dismissing all of Plaintiffs' claims in their entirety, and granting such other and further relief as the Court may deem just and proper.

Dated: August 30, 2019  
New York, New York

Respectfully submitted,

SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM LLP,

by: /s/ Maura Barry Grinalds  
Maura Barry Grinalds  
Boris Bershteyn  
Scott D. Musoff  
Michael D. Moritz

Four Times Square  
New York, NY 10036  
(212) 735-3000  
maurabarry.grinalds@skadden.com

*Counsel for Defendant Argentine Republic*

CRAVATH, SWAINE & MOORE LLP,

by: /s/ Michael A. Paskin  
Michael A. Paskin  
Damaris Hernández

Members of the Firm

Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019  
(212) 474-1000  
mpaskin@cravath.com

*Counsel for Defendant YPF S.A.*